

**FEDERAL PUBLIC DEFENDER
DISTRICT OF NEW JERSEY**

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March 23, 2018

Honorable Noel L. Hillman
United States District Judge
Mitchell H. Cohen Federal Courthouse
One John F. Gerry Plaza
Fourth and Cooper Streets
Camden, New Jersey 08101

Re: United States v. Santos Colon
Criminal No. 17-119 (NLH)

Dear Judge Hillman:

Please accept this letter in lieu of a more formal submission in support of a proposed Order Allowing Release to Attend a Family Gathering in the captioned matter. The purpose of this request is to allow the defendant, Santos Colon, an opportunity to have brunch with his family on Easter Sunday, April 1, 2018, between the hours of 10:00 a.m. and 3:00 p.m.

Counsel has spoken with the parents of Santos Colon and instructed them that if the requested relief is granted, they would be required to serve as Third Party Custodians. Both Santos Colon, Sr. and Catherine Colon agreed to fulfill the requirements and responsibilities of a third party a custodian, including reporting any conduct by their son that violates his conditions of release. Additionally, counsel has conferred with Pretrial Services who have confirmed that Santos Colon will be electronically monitored during the time specified in the proposed Order. Counsel has also confirmed that a Youth Consultation Service staff member, Julian Smentek, will accompany Santos Colon and his family during the period specified in the proposed Order. Counsel has further confirmed that the United States has no objection to the proposed Order. Finally, during a monthly status meeting conducted on March 22, 2018, YCS and academic staff confirmed that Santos Colon's conduct, academic achievement, and mental health treatment, have consistently demonstrated progress and respect for supervision and the orders of this Court.

The proposed Order provides that Mr. Colon be allowed to leave his YCS residence in the company of his parents and a YCS staff member on April 1, 2018 at 10:00 a.m., so that he can be transported to a location approved by the Pretrial Services Office for a family meal and that he be returned to his YCS residence not later than 3:00 p.m. on April 1, 2018.

Thank you for your consideration in this matter.

Respectfully,

s/ Richard Coughlin

RICHARD COUGHLIN
Federal Public Defender

cc: Patrick Askin , Attorney-in- Charge
C. Alexandria Bogle, Trial Attorney, Department of Justice
Christine Dozier, Chief Pretrial Services Officer
Gary Pettiford, Pretrial Services officer

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Enclosure